

EXHIBIT 1

**THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
MOON GROUP, INC., *et al.*,¹) Case No. 21-11140 (CSS)
)
Debtors.) (Jointly Administered)
)
) Re: Doc. 85

**STIPULATION AND AGREED ORDER REGARDING MOTION OF DEBTORS AND
DEBTORS-IN-POSSESSION FOR AN ORDER PURSUANT TO F.R. CIV. P. 26(c) AND
DEL. BANKR. L.R. 7030-1(c) QUASHING NOTICE OF
DEPOSITION OF JOHN D. PURSELL, JR.**

WHEREAS, on August 19, 2021, KORE Capital Corporation (“KORE”) served a Notice of Deposition on John D. Pursell, Jr.;

WHEREAS, on August 30, 2021, the above-captioned Debtors filed a Motion of Debtors and Debtors-in-Possession for an Order Pursuant to F.R. Civ. P. 26(c) and Del. Bankr. L.R. 7030-1(c) Quashing Notice of Deposition of John D. Pursell, Jr. (Doc. 85) (the “Motion”);

WHEREAS, on August 30, 2021, KORE filed an opposition to the Motion (Doc. 86); and

WHEREAS, KORE and the Debtors have agreed to resolve the Motion on the terms and conditions set forth herein.

NOW, THEREFORE, KORE and the Debtors agree that John D. Pursell, Jr. shall be excused from testifying pursuant to KORE’s Notice of Deposition, provided that the Debtors comply with the following:

1. By no later than 5:00 p.m. on September 3, 2021, the Debtors shall produce to KORE projections of accounts receivable as of the end of September and October, 2021;

¹ The Debtors in these chapter 11 cases, along with the last four digits of each of the Debtors’ respective federal tax identification numbers, are as follows: Moon Group, Inc. (7484); Moon Landscaping, Inc. (3442); Moon Nurseries, Inc. (8411); Moon Site Management, Inc. (0250); Moon Wholesale, Inc. (3232); and Rickert Landscaping, Inc. (3988). The Debtors’ headquarters and mailing address is 145 Moon Road, Chesapeake City, MD 21915.

2. With respect to the \$572,605.00 post-petition cash receipt from StoneMor Operating, LLC, the Debtors shall produce to KORE, by no later than 5:00 p.m. on September 3, 2021, documents supporting the invoiced amount corresponding to the payment and the reason for the reduction;

3. By no later than September 3, 2021 at 5:00 p.m., the Debtors shall produce to KORE copies of invoices to StoneMor Operating, LLC from June 1, 2021 to the present, or any other documentation regarding the amount that the Debtors expected StoneMor Operating, LLC to pay; and

4. By no later than September 8, 2021 at 5:00 p.m., the Debtors shall produce to KORE copies of invoices to account debtors evidencing amounts due as of the petition date.

Dated: September 2, 2021

/s/ Michael G. Busenkell

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